

FREIMUND JACKSON & TARDIF, PLLC
ATTORNEYS AT LAW

COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 3545
SEATTLE, WA 98104
TEL: 206-582-6001
FAX: 206-466-6085

GREGORY E. JACKSON
JOHN R. NICHOLSON
AMEE J. TILGER

EVERGREEN PLAZA BUILDING
711 CAPITOL WAY SOUTH, SUITE 602
OLYMPIA, WA 98501
TEL: 360-534-9960
FAX: 360-534-9959

MICHAEL E. TARDIF
JEFFREY A. O. FREIMUND
AMANDA C. BLEY

August 16, 2017

Kyle Lydell Canty, Inmate #401358
WA State Department of Corrections
P.O. Box 900
Shelton, WA 98584

**RE: Kyle Lydell Canty v. City of Seattle, et al.
USDC Western District No. 2:16-cv-01655 RAJ-JPD**

Dear Mr. Canty:

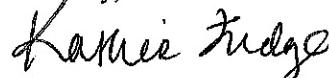
Enclosed please find the following Authorizations and Stipulations which we are requesting your signature so that we can forward to the providers:

1. Harborview Medical Center;
2. King County Adult Detention;
3. Western State Hospital.

We have also enclosed four blank Authorization and Stipulations for you to fill out providing the providers contact information in the blank area on the first page, signing and returning to our office for further processing.

Also enclosed are Defendants City of Seattle, Officer Marshall Coolidge; Officer Sean Culbertson, Officer Timothy Renihan and Officer Andrew Hancock's First Interrogatories and Requests for Production to Plaintiff Kyle Lydell Canty.

Sincerely,



KATHIE FUDGE, Legal Assistant to
GREGORY E. JACKSON
206-582-6001

GEJ:kpf
Enclosures

cc: Samantha D. Kanner, w/Enclosures

1
2
3
4
5 Honorable Richard Jones
6

7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 KYLE LYDELL CANTY,

Plaintiff,

11 vs.

12 CITY OF SEATTLE, et al.,

13 Defendants.

NO. 2:16-CV-01655-RAJ-JPD

DEFENDANTS CITY OF SEATTLE,
OFFICER MARSHALL COOLIDGE,
OFFICER SEAN CULBERTSON, OFFICER
TIMOTHY RENIHAN AND OFFICER
ANDREW HANCOCK'S FIRST
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO PLAINTIFF KYLE
LYDELL CANTY

14 TO: KYLE LYDELL CANTY, Plaintiff Pro Se

15 In accordance with Fed. R. Civ. P. 33, you are required to answer the following
16 interrogatories, separately and fully, under oath, within thirty (30) days of the date of service of
17 these interrogatories upon you.

18 Also contained herein are requests for production pursuant to Fed. R. Civ. P. 34. Please
19 produce the requested material for inspection and copying by defendant's attorney at the address
20 stated below by no later than thirty (30) days from the date of service. These discovery requests
21 are continuing in nature and you must supplement your responses pursuant to Fed. R. Civ. P.
22

23 26(e).

24 ///

25 ///

26 ///

CITY DEFENDANTS' FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PLAINTIFF KYLE
LYDELL CANTY --
NO. 2:16-CV-01655-RAJ-JPD

1

FREIMUND JACKSON & TARDIF, PLLC
701 FIFTH AVENUE, SUITE 3545
SEATTLE, WA 98104
TEL: (206) 582-6001
FAX: (206) 466-6085

Exhibit 1
006

1
2 **INTERROGATORIES AND REQUESTS FOR PRODUCTION**

3 **INTERROGATORY NO. 1:** Please identify each person with knowledge of any of the
4 allegations and/or averments of fact contained in Plaintiff's Complaint. Please include a
5 summary of the facts known as well as the current address and telephone number for each
6 person identified.

7 **ANSWER:**

8
9
10
11
12
13
14
15 **REQUEST FOR PRODUCTION A:** Please produce for inspection and copying any document,
16 recording, or electronic data that supports any of the allegations and/or averments of fact
17 identified in Plaintiff's Complaint.

18 **RESPONSE:**

19
20
21
22
23
24
25
26
CITY DEFENDANTS' FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PLAINTIFF KYLE
LYDELL CANTY --
NO. 2:16-CV-01655-RAJ-JPD

2

FREIMUND JACKSON & TARDIF, PLLC
701 FIFTH AVENUE, SUITE 3545
SEATTLE, WA 98104
TEL: (206) 582-6001
FAX: (206) 466-6085

Exhibit 1
007

1 **INTERROGATORY NO. 2:** Please identify and provide a detailed computation of each and
2 every category of damages that you claim to have suffered as a result of Defendants' alleged
3 actions. Defendants specifically request that you provide an explanation of damages for the
4 calculation of each dollar amount in each category.

5
6
7
8
9
10
11
12
ANSWER:

13 **INTERROGATORY NO. 3:** Identify any statements, correspondence, letters, emails, blogs,
14 social media posting (i.e., Facebook, MySpace, Twitter, Instagram, Tumblr), videos (i.e.,
15 YouTube, Vimeo) or other documents sent to any individual or received from any individual
16 (other than attorney/client privilege) related to this litigation or any of the incidents described in
17 Plaintiff's Complaint.

18
19
20
21
22
23
24
25
26
ANSWER:

1 **REQUEST FOR PRODUCTION B:** Please produce for inspection and copying any and all
2 statements, correspondence, letters, emails, blogs, social media postings, tweets, videos or other
3 documents sent to any individual or received from any individual (other than attorney/client
privilege) relating to this litigation or any of the incidents described in Plaintiff's Complaint.

4 **RESPONSE:**

5
6
7
8
9
10
11
12 **INTERROGATORY NO. 4:** Please state the name, address and telephone number of each
13 health care provider, including mental health care, who has treated or examined you during the
ten (10) years preceding the incidents alleged in Plaintiff's Complaint.

14 **ANSWER:**

1 **REQUEST FOR PRODUCTION C:** Please produce for inspection and copying all medical,
2 hospital, and other health care records from treatment providers listed in the preceding
3 interrogatory. This request can be satisfied by completing and signing the attached authorizations
4 allowing defense counsel to obtain health care records.

5 **RESPONSE:**

6
7
8
9
10 **INTERROGATORY NO. 5:** Have you ever been convicted of or pled guilty to a felony?
11 And, have you ever been convicted of or pled guilty to a misdemeanor involving dishonesty or
12 false statement? If so, state for each:

- 13 (a) The name of the crime charged and the crime convicted of;
14 (b) The date of the charge and conviction;
15 (c) The date and place of the conviction and sentence imposed; and
16 (d) The court and case number.

17 **ANSWER:**

1 **INTERROGATORY NO. 6:** Have you been a party to any lawsuits, including bankruptcy
and/or divorce proceedings, in the past ten (10) years? If so, provide:
2

- 3 (a) A description of the nature of lawsuit;
4 (b) The names of parties (or case name);
5 (c) The court and cause number;
6 (d) The outcome of lawsuit.

7 **ANSWER:**
8
9
10
11
12
13

14 **INTERROGATORY NO. 7:** Please state your educational history beginning with high
school, including the name of each institution attended, any degrees and honors received, and
dates of attendance.
15

16 **ANSWER:**
17
18
19
20
21
22
23
24
25
26

1 **INTERROGATORY NO. 8:** Please list the name and address of each of your employers for
2 the past ten (10) years (including yourself if you were self-employed).

3 **ANSWER:**

10 **INTERROGATORY NO. 9:** Did you drink any alcoholic beverages within 24 hours prior to the
11 incident referred to in the Complaint? If so, state:

- 12 (a) When and where;
13 (b) Names and addresses of persons present;
14 (c) Amount consumed.

15 **ANSWER:**

1 **INTERROGATORY NO. 10:** Did you take any drug, narcotic, sedative, tranquilizer or other
2 form of medication within 24 hours before the incident referred to in the Complaint? If so, for
3 each preparation please state the identity of the preparation, the date taken, the amount taken, the
4 reason for taking it, and if procured under a prescription, the name and address of the person
5 prescribing it.

6 **ANSWER:**

7
8
9
10
11 **INTERROGATORY NO. 11:** Have you ever been involuntarily committed in Washington state
12 or in any other jurisdiction prior to the incidents alleged in Plaintiff's Complaint? If so, please
13 state:

- 14 (a) The name of the county and state of the commitment;
15 (b) The date of the commitment;
16 (c) The place of the commitment; and
17 (d) The court and case number.

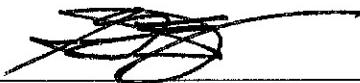
18 **ANSWER:**

1 **INTERROGATORY NO. 12:** Were you ever evaluated, diagnosed or treated for a mental
2 health condition prior to the incidents alleged in Plaintiff's complaint? If so, please state:
3

- 4 (a) The date of the evaluation, diagnosis or treatment;
5 (b) The name and address of the mental health professional evaluating, diagnosing
6 or treating you for the mental health condition; and
7 (c) The mental health conditions you were diagnosed with, if any.

8 **ANSWER:**

9
10 DATED this 15 day of August, 2017.

11
12 

13 GREGORY E. JACKSON, WSBA #17541
14 JOHN R. NICHOLSON WSBA #30499
15 AMEE J. TILGER, WSBA #34613
16 Freimund Jackson & Tardif, PLLC
17 701 5th Avenue, Suite 3545
18 Seattle, WA 98104
19 Telephone: (206) 582-6001
20 Facsimile: (206) 466-6085
21 gregj@fjtlaw.com
22 Attorneys for Defendants City of Seattle,
23 Officer Marshall Coolidge, Sean Culbertson,
24 Timothy Renihan and Officer Hancock

DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that I am the Plaintiff in this action and am authorized to make the foregoing answers. I declare under penalty of perjury that that have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

DATED this _____ day of _____, ____ at _____.

KYLE LYDELL CANTY

Washington.

CITY DEFENDANTS' FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PLAINTIFF KYLE
LYDELL CANTY --
NO. 2:16-CV-01655-RAJ-JPD

10

FREIMUND JACKSON & TARDIF, PLLC
701 FIFTH AVENUE, SUITE 3545
SEATTLE, WA 98104
TEL: (206) 582-6001
FAX: (206) 466-6095

Exhibit 1
015

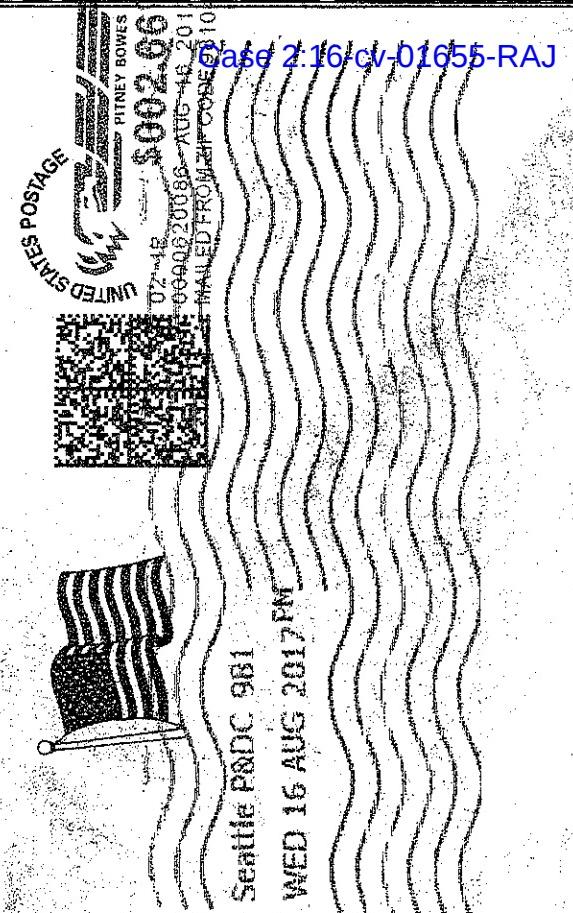
CERTIFICATE OF SERVICE

I certify that on the 16th day of August, 2017, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

5	Pro se Plaintiff, Kyle Lydell Canty, #401358 WA State Department of Corrections P.O. Box 900 Shelton, WA 98584	(X) U.S. Mail
8	Samantha D. Kanner, WSBA #36943 Deputy Prosecuting Attorney King County Prosecuting Attorney's Office 500 Fourth Avenue, 9 th Floor Seattle, WA 98104	(X) U.S. Mail

DATED this 16th day of August, 2017, in Seattle, Washington.

Kathie Fudge
KATHIE FUDGE, Legal Assistant to
GREGORY E. JACKSON
701 5TH Avenue, Suite 3545
Seattle, WA 98104
kathief@fitlaw.com



C107

**Freimund Jackson & Tardif
P.L.L.C.**

Attorneys at Law

701 Fifth Avenue, Suite 3545, Seattle, WA 98104 | fjtlaw.com

Kyle Lydell Carty, Inmate #401358
WA State Department of Corrections
P.O. Box 900
Sheriff WA 98584

Refused by offender

1309/01/17
1309/01/17
1309/01/17